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East Brunswick, New Jersey 08816

  
CHEMICAL LAND HOLDINGS, INC.

November 17, 2000

U.S. Environmental Protection Agency, Region II  
Emergency and Remedial Response Division  
Diamond Alkali Superfund Site/Passaic River Study Area  
290 Broadway, 19th Floor, Room W-20  
New York, NY 10007-1866

Attention: Ms. Janet Conetta  
Strategic Integration Manager

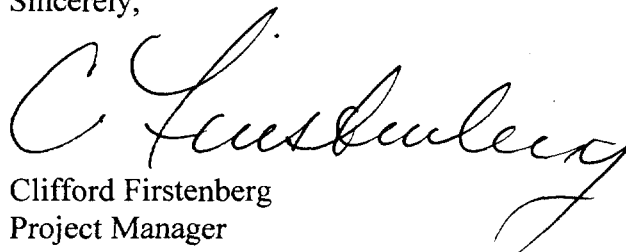
Subject: Monthly Progress Report No. 79  
Passaic River Study Area

Dear Ms. Conetta:

Submitted herewith are two (2) copies of Monthly Progress Report No. 79 for work performed during October 2000 at the Passaic River Study Area. This progress report has been prepared pursuant to Section X, Paragraph 64 of the Administrative Order of Consent between U.S. Environmental Protection Agency and Occidental Chemical Corporation, Index No. II-CERCLA-0117.

If you have any questions, please contact me at (732) 246-5851.

Sincerely,



Clifford Firstenberg  
Project Manager  
On behalf of Occidental Chemical Corporation  
(as successor to Diamond Shamrock Chemicals Company)

(2 copies sent)

Attachment

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Ms. Janet Conetta  
Passaic River Study Area  
November 17, 2000  
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- 2c: Section Chief  
NJDEP-Bureau of Federal Case Management  
401 East State Street -CN 028  
Trenton, NJ 08625-0028  
Attn: Jonathan D. Berg
- 1c: Chief, New Jersey Superfund Branch  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
290 Broadway, 19th Floor, Room W-20  
New York, NY 10007-1866  
Attention: Diamond Alkali Site Attorney - Passaic River Study Area

**MONTHLY PROGRESS REPORT NO. 79**  
**PASSAIC RIVER STUDY AREA**  
**WORK PERIOD: October 2000**

A. Actions Taken Toward Achieving Compliance with the Order

1. Implement the protocol for evaluation of the potential use of the STUDH-2000 (SED2DV45) beta model for the Passaic River Study Area.
2. Implement human health risk assessment according to RAGS Part D – developing first interim deliverable: Tables 1 and 4.
3. Implement ecological risk assessment according to ERAGS – developing first interim deliverable: problem formulation.
4. Validation of Spring ESP data.
5. Implement screening of remedial treatment technologies.

B. Actual or Potential Violations and Other Problems Encountered:

1. SED2DV45 does not appear to conserve mass (first reported in Monthly Progress Report No. 78, September 2000).
2. SED2DV45 test case model results differ between WES and CLH (first reported in Monthly Progress Report No. 78, September 2000).
3. Lack of surface water data precludes assessing a number of receptors in the human health risk assessment and in developing an ecological risk assessment consistent with EPA guidance that considers the surface water pathway (first reported in Monthly Progress Report No. 78, September 2000).

C. Corrective Actions:

1. A number of tests to evaluate the lack of mass conservation in SED2DV45 are being conducted. CLH submitted a letter to EPA and WES reporting on the results of additional testing (October 31, 2000).
2. A number of tests to determine the cause of differing model results between SED2DV45 run by WES versus SED2DV45 run by CLH are being conducted. CLH will advise EPA and WES of the outcome.
3. CLH submitted a letter describing the missing surface water data and a recommendation for mitigating the problem (October 19, 2000).

D. Validated Sampling or Testing Results Received or Generated During the Course of Implementing the Work:

1. None.

**MONTHLY PROGRESS REPORT NO. 79**  
**PASSAIC RIVER STUDY AREA**  
**WORK PERIOD: October 2000**  
(continued)

E. Future Plans, Actions and Data Scheduled for November and December 2000:

1. Determine the cause of different model results for SED2DV45 run by WES versus SED2DV45 run by CLH, and communicate to EPA and WES.
2. Resume implementation of the protocol for evaluation of the potential use of the STUDH-2000 (SED2DV45) beta model for the Passaic River Study Area, upon resolution of the two identified problems (lack of mass conservation and differing results between CLH and WES versions of the model).
3. Submit the first human health risk assessment interim deliverable according to RAGS Part D.
4. Submit the first ecological risk assessment interim deliverable according to ERAGS.
5. Continue validation of Spring ESP data.
6. Meetings with treatment technology vendors.
7. Evaluation of need for treatability testing.
8. CSO Trial Run Meeting.
9. Submit revised CSO Work Plan and schedule for implementation.

F. Work Completion Estimates:

1. The RIWP is 100% complete.
2. The FSWP is 100% complete.
3. The Graphic Data Representation is 100% complete.
4. The Model Test Case Report is 100% complete.
5. The Screening-Level HERA is 100% complete.
6. The Alternatives Array Document is 35% complete.
7. The Ecological Sampling Plan is 100% complete (i.e., original submittal to EPA).
8. The Calibration and Verification Status Report is 100% complete (i.e., original submittal to EPA)
9. Creel/Angler Survey Work Plan is 100% complete (i.e., original submittal to EPA)

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**PASSAIC RIVER STUDY AREA**  
**WORK PERIOD: October 2000**  
(continued)

G. Delays Encountered or Anticipated and Mitigation Actions:

1. Lack of mass conservation in SED2DV45 and the tests being performed to determine the cause, may delay completion of the implementation of the protocol for evaluation of the potential use of the STUDH-2000 (SED2DV45) beta model for the Passaic River Study Area.
2. Differing model results between WES and CLH when running standard model input using SED2DV45 and the tests being performed to determine the cause, may delay completion of the implementation of the protocol for evaluation of the potential use of the STUDH-2000 (SED2DV45) beta model for the Passaic River Study Area.
3. The lack of surface water data to support the human and ecological risk assessments can be mitigated though the timely implementation of a surface water collection program. If implemented in a timely manner, this additional field program may not affect the project schedule.